REMARKS

The present invention is a portable telecommunication apparatus for requesting download of pages of information from a remote source and a method of requesting the download of pages of information from a remote source in a portable apparatus. In accordance with the invention, the portable telecommunication apparatus receives pages of information, such as pages in HTML (Hypertext Mark up Language) encoded, for example, from the World Wide Web (WWW). See page 6, lines 1-7, of the specification. The received pages include encoded information identifying links to other pages which, for example, may contain an anchor tag to identify the link to the other pages. See page 7, lines 10-31, thru page 8, lines 1-13, of the specification. A display 115, 210 and 415 is used to display the links to other pages. A fixed location input key or keys 125, 425 and 525 permit the user by actuation to request the linked page specified by the particular link associated with the key to be sent as if the user had been able to select the link using a mouse and a cursor. See page 8, lines 24-29; page 10, lines 10-23; and page 11, lines 1-17, of the specification. The microprocessor 205 consistently associates the input key or input keys with the encoded information identifying a linked page during a display period such that actuation of the input key or the input keys during a display period requests the respective linked page or pages for download from the remote source. See page 7, lines 10-31, through page 8, lines 1-29, of the specification.

Claims 1-14 and 16-19 stand rejected under 35 U.S.C. §103 as being unpatentable over WO 99/35595 (Lahtinen) in view of United States Patent

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5,854,624 (Grant). With respect to claims 1 and 14, the Examiner reasons as

follows:

> Regarding claims 1 and 14, Lahtinen teaches a portable
> telecommunication apparatus for requesting the download of pages of
> information from a remote source comprising (page 1, lines 3-6):
> means for receiving the pages of information including encoded
> information identifying links to other pages (page 3, lines 22-28); a
> display for displaying the received page (telephone 1); and a fixed
> location input key (input key of telephone 1). Lahtinen does not teach
> the associating the fixed location input key with the linked page such
> that actuation of the fixed location input key during the display period
> requests the respective linked page for download from the remote
> source. However, such feature is known in the art as taught by Grant,
> Grant teaches pocketsized user interface for Internet browser terminals
> which comprises preprogrammed keys to download web page (Fig. 5,
> col 5, lines 41-67). Grant also teaches the display labeling at
> predefined position 54. It would have been obvious to one of ordinary
> skill in the art, having the teaching of Lahtinen and Grant before him at
> the time the invention was made, to modify the interface system taught
> by Lahtinen to include preprogrammed keys taught by Grant with the
> motivation being to quickly and conveniently browse the Internet.

These grounds of rejection are traversed for the following reasons.

Independent claim 1 recites:

> A portable telecommunication apparatus for requesting the
> download of pages of information from a remote source comprising:
> means for receiving the pages of information including encoded
> information identifying links to other pages;
> a display for displaying the received pages;
> a fixed location input key; and
> a processor for consistently associating the fixed location input
> key with the encoded information identifying a linked page during a
> display period such that actuation of the fixed location input key during
> the display period requests the respective linked page for download
> from the remote source.

Independent claim 14 recites:

> A method of requesting the download of respective pages of received information from a remote source in a portable apparatus, comprising:
> receiving pages of information including encoded information identifying links to other pages;
> identifying linked pages from the encoded information, the encoded information including a functional element for consistently associating operation of an identified input device with a request for download of the linked page from the remote source, and a visual element for labelling the operation;
> separating the labelling and functional elements of the encoded information;
> displaying the labelling information at a predefined position; and
> defining the function of the identified input device using the functional element of the encoded information such that on operation of the identified input device the linked pages are requested for download.

Each of claims 1 and 14 substantively recite <u>receiving pages of information from a remote source including encoded information identifying links</u> to other pages with claim 1 further reciting a processor for consistently associating the fixed information input key with <u>the encoded information identifying a linked page</u> during a display period during <u>such that actuation of the fixed location input key</u> during a display period <u>requests the respective linked page for download from the remote source</u> and in claim 14, "<u>identifying linked pages from the encoded information, the encoded information including a functional element consistently associating operation of the identified input device with a request for download of the linked page from the remote source</u>." These features are not suggested by the combination of Lahtinen and Grant for the following reasons.

Lahtinen discloses a method and system for browsing hypertext pages using a mobile station. Lahtinen differs fundamentally from the claimed invention in teaching that the textual content and the linked part are sent to the mobile station

separately from each other as described in column 2, lines 29-33, instead of together as claimed. The links are sent in a menu format, such as a code by which the conversion means can find the link corresponding to the description and its URL address in the information is saved. See column 2, lines 34-37 through column 3, lines 1-4. The actual content of the page is sent in the form of a short message. See page 4, line 37 through page 5, lines 1-2.

The Examiner correctly admits one fundamental difference between Lahtinen and the claims in stating, as set forth above, "Lahtinen does not teach the associating the fixed location input key with the linked page, such that actuation of the fixed location input key during the display period requests the respective linked page for download from the remote source".

The Examiner erroneously relies upon Grant for teaching this subject matter.

Grant discloses a pocket sized user interface for internet browser terminals and the like. The actual hypertext page is displayed using a separate display device 54 which is connected to a PC. A keypad 30 includes common functions associated with an internet browser, such as back, forward, reload and home, as discussed in column 5, lines 41 *et seq.* The programming of the functions described in column 5, lines 42 *et seq.* is not discussed. Thus, in view of the brevity of their disclosure, a person of ordinary skill in the art has to consider how these functions would be implemented and precisely what their operational characteristics are.

It is submitted that a person of ordinary skill in the art would consider Grant to teach that a URL would be associated with a key by typing in the URL or by saving the URL of the page that is currently open. The aforementioned functions back,

forward, reload and home must be predefined and preprogrammed. Saving of URLs requires user intervention.

Each of independent claims 1 and 14 reference "the encoded information" in the last limitation which has as its antecedent the "encoded information identifying links to other pages" within the first limitation thereof. Therefore, claims 1 and 14 must be construed to include the encoded link to other pages to be that obtained when the page is downloaded from a remote source.

The Examiner responds on page 5 of the Office Action to the Applicant's previous arguments as follows:

> In response to Applicant's argument "a person of ordinary skill in the art would not consider . ...," it is noted that such is not quite the case. Various buttons in the navigating group 62 in Grant teaching read on this limitation. For example, since "Home" button may return the user to a pre-selected home page (col 5, lines 44-45), it is interpreted that Grant teaches "associating ("pre-programming" in Grant) the input key ("Home" button in Grant) with the encoded information (URL address of the pre-selected home page in Grant) identifying a respective linked page ("pre-selected home page" in Grant) during a display period such that the actuation of the input key during the display period requests the respective linked page for download from the remote source ("return the user to the pre-selected home page" in Grant). Another example, the teaching of "Reload" button may reload current web page again" (col 5, lines 54) can be interpreted as "associating ("pre-programming' in Grant) the input key ("Reload" button in Grant) with the encoded information (URL address of current web page in Grant) identifying a respective linked page ("current web page" in Grant) during a display period such that the actuation of the input key during the display period requests the respective linked page for download from the remote source ("reload the current web page again" in Grant).

The Examiner has erroneously concluded that the encoded information may be the URL address of the preselected home page of Grant. However, this construction is not a suggestion of downloading from a remote source including pages of information including an encoded link to other pages. The

home function is defined as a <u>pre-selected home page</u> which is not disclosed as being provided as an encoded link to other pages along with pages of information as claimed.

It is submitted that the functions of the navigation group 62 described on page 5, lines 40 *et seq.* do not suggest an encoded link to other pages received with pages of information received from the remote source according to the recitations in independent claims 1 and 14. While it is possible with Grant to display a web page by using a URL with one of the keys, such linkage would also not meet the limitation consistently associating the fixed location input key or an identified input device with the encoded information identifying a linked page which is received from a remote location as recited in the claims of the linked page in claim 14.

In summary, even if a person of ordinary skill in the art were motivated to combine the teachings of Lahtinen and Grant, the claimed subject matter would not be achieved. Moreover, the Examiner has not demonstrated any basis why a person of ordinary skill in the art would be motivated to make the proposed combination.

The dependent claims define more specific aspects of the present invention which are not rendered obvious by the proposed combination of Lahtinen and Grant.
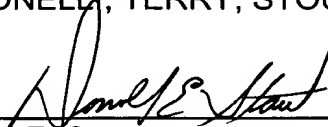
In view of the foregoing remarks, it is submitted that each of the claims in the application is in condition for allowance.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in

connection with the filing of this paper, including extension of time fees, to

Deposit Account No. 01-2135 (1154.39383X00) and please credit any excess

fees to such Deposit Account.

Respectfully submitted,

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